

**IN THE UNITED STATES DISTRICT COURT,  
FOR THE NORTHERN DISTRICT OF ILLINOIS,  
EASTERN DIVISION**

JILL MEHRBERG

Plaintiff,

v.

**Case No. 1:18-cv-02032**

STATE OF ILLINOIS,

**Honorable Robert M. Dow**

Defendant.

**PLAINTIFF'S MOTION FOR LEAVE TO FILE, *INSTANTER*,  
RESPONSE TO DEFENDANT'S MOTION TO DISMISS**

Plaintiff, JILL MEHRBERG ("Ms. Mehrberg"), by and through her undersigned counsel, respectfully moves this Court for the entry of an Order allowing the filing, *instante*, of her Response to Defendant's Motion to Dismiss, and states as follows:

1. Plaintiff mistakenly belatedly filed her Response to Defendant's Motion.
2. Accordingly, Plaintiff seeks leave to file, *instante*, that Response.
3. Moreover, since Plaintiff has filed that Response, Plaintiff requests that leave be granted for it to be considered filed, *instante*, and thus for her not to be required to re-file it.
4. No party will be prejudice by the granting of this Motion, and it is not brought for any improper purpose.

**WHEREFORE**, Plaintiff, Ms. Mehrberg, by and through her undersigned

counsel, respectfully prays for the entry of an Order allowing the filing of her of Response to Defendant's Motion to Dismiss, and for all such other relief that is just and proper under the circumstances and recoverable.

**RESPECTFULLY SUBMITTED,**

**By: s/Michael I. Leonard  
Counsel for Plaintiff**

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**CERTIFICATE OF SERVICE**

The undersigned states that, on August 20, 2018, he caused the above to be served on counsel of record by way of electronically filing it by way of the ECF filing system, and by way of e-mail to opposing counsel.

**RESPECTFULLY SUBMITTED,**

**By: s/Michael I. Leonard  
Counsel for Plaintiff**